

1-R-Wetland Permit Application Nov 2017 reduced Sections 1-4 rev Dec 2017.pdf

Block 3 – Written Summary of All Proposed Activities

The last paragraph discusses treatment of non-contact stormwater associated with the overburden stockpile, and how it will be collected and routed. In the first sentence it reads that non-contact water will be routed to two (2) stormwater detention ponds prior to discharge to wetland. The next sentence states that stormwater will be discharged to upland immediately adjacent to wetland WL-A1. Our question therefore is, “does this stormwater discharge directly to the wetland or to upland?” Discharge directly to a jurisdictional wetland is an activity regulated by MDEQ.

Block 6 – Easements and Other Permits

Aquila does not detail if any additional permits will be required.

Is a Part 91, of PA 451 Soil Erosion and Sedimentation Permit required?

Attached images & sketches to the joint permit application:

Notes we found on the bottom left of digital orthophotography (specifically Figures 4-4 and 4-5) show a horizontal datum as NAD - 83. What vertical datum was used to describe topography in either of those figures or any subsequent figures? We noted in block 10 of the application form that NAVD 88 was the datum selected for measuring the apparent water elevation.

Some figures show job number 14A021, yet the other figures have job number 17A021. Do the figures with the 14A021 job number reflect the most recent project information?

2-R-Wetland Permit Application Nov2017 reduced Sections 5-7 rev Dec 2017.pdf

On page 12 of 362, the MDEQ’s wetland assessment report dated July 12, 2017 notes that MDEQ identified two (2) wetland areas had not been included by the latest wetland delineation (assume the consultants’ delineation). It gives further detail of its connection down-gradient to other wetlands. Has the entire permit application and all attachments pertaining to this apparent discrepancy corrected to reflect the additional wetland areas identified by the MDEQ?

3-R-Wetland Permit Application Nov 2017 reduced Section 8A.pdf

We note Figure 1 (mitigation site search overview map) through X19 in Appendix B are marked “draft” in a red font. Have Aquila’s consultants created a final for each?

4-R- Wetland Permit Application Nov 2017 reduced Section 8B.pdf

No comments.

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5-R- Wetland Permit Application Nov 2017 reduced Section 8.pdf

The Michigan Rapid Assessment Method for Wetlands (MiRAM) is a tool to determine the "functional value" of a particular wetland and to assign a rating level to that wetland as compared to other wetlands. In reviewing the MiRAM, on page 12 of the MiRAM (page 43 of 645 of the .pdf), we add the scores from sections 6d and 6e for a total of 8. The form shows a Metric Total of 6 in the box. Therefore the MiRAM total on page 13 of the MiRAM form should be 60, yet the total in the box shows 58. This appears to be a math error. Please clarify.

- Page 50 of 645 of the pdf, Metric 3. Hydrology, we note the form showing a groundwater score of 2, yet the score in the fill-in box shows 1. This appears to be a math error. Please clarify.

- Page 56 of 645. In combining the scores from 6a-6f we find a total of 12. The score box shows 13. This appears to be a math error. Please clarify.

- Page 69 of 645. In combining the scores from 6a-6f we find a total of 15. The score box shows 14. This appears to be a math error. Please clarify.

- Page 70 of 645. In combining the scores shown and with our correction (from page 69), the correct total should be 77, not 76. This appears to be a math error. Please clarify.

- Page 95 of 645. In combining the scores from 6a-6f we find a total of 13. The score box shows 11. This appears to be a math error. If this is the case then the total on page 96 of 645 should be 46, and not 44.

- Page 108 of 645. In combining the scores from 6a-6f we find a total of 17. The score box shows 16. This appears to be a math error. If this is the case, then the total on page 109 of 645 should be 79, and not 78.

- Page 115 of 645. Metric 3 Hydrology. The score shows 2 points for groundwater, yet the fill-in block shows 1 point. Is 2 points the maximum that can be scored, or is this a fixed number? If so then the fill-in should be corrected to show 2 points. Further, the total on page 116 of 645 would be 13 not 12, and page 122 of 645 would have a total of 53 not 52.

- Page 129 of 645. Metric 3 total. In combining 3a-3d, we get a total of 15 points, and not 8 points as shown. This appears to be a math error. Please clarify.

- Page 135 of 645. In checking the MiRAM grand total, we get a total of 79 points, not 71 as shown. This appears to be a math error. Please clarify

- Page 144 of 645. In checking the Metric 4 total (4a-4c), we get a total of 15. The Metric 4 total shows as 15x in the total box. Is this a typo, and it should be just 15? If not, then what does the X mean?

- Page 147 of 645. Metric 6 total. In combining the scores from 6a-6f, we get 21, not 20 as shown. If this is the case then the number on page 148 of 645 should be 95, and not 94. Please clarify.

- Page 186 of 645. Metric 6 total. In combining 6a-6f, we get a total of 21 points, and not 18 points as shown (20 points max). This appears to be a math error. If this is the case then page 187 of 645 should show a score of 84, and not 81. Please clarify.

- Page 200 of 645. Grand total. In the quantitative rating, Metric 6 has a score of 2. In checking the total score for Metric 6 on page 199, it shows Metric 6 with a score of 11. If this is correct then the grand total should be 72, and not 63. Please clarify.

- Page 487 of 645. Metric 6 total. In combining 6a-6f, we get a total of 19 points, and not 20 points as shown. This appears to be a math error. If this is the case then the grand total shown on page 488 should be 90.5, and not 91.5.

6-R-Wetland Permit Application Nov 2017 reduced App A1 rev Dec 2017.pdf

Do the figures with the 14A021 job number reflect the most recent project information?

7-R-Wetland Permit Application Nov 2017 reduced App A2 (1).pdf

On page 186 of 297, 15x is shown as the Metric 4 total. What does the "X" indicate? Totals for the other metrics do not show a letter following the number.

8-R-Wetland Permit Application Nov 2017 reduced App B.pdf

Do the figures with the 14A021 job number reflect the most recent project information?

Tribal Engagement Review Summary for MDEQ 11 3 2016 reduced.pdf

Do the figures with the 14A021 job number reflect the most recent project information?
